1	KESSLER TOPAZ MELTZER								
2	& CHECK, LLP JENNIFER L. JOOST (Bar No. 296164)								
3	(jjoost@ktmc.com) STACEY M. KAPLAN (Bar No. 241989) (skaplan@ktmc.com)								
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6	Fax: (415) 400-3001								
7	Counsel for SEB Investment Management AB and Lead Counsel for the Putative Class								
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9	HNITED STATES	DISTRICT COURT							
10	UNITED STATES DISTRICT COURT								
11		STRICT OF CALIFORNIA							
12	SAN FRANCIS	SCO DIVISION							
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14	SEB INVESTMENT MANAGEMENT AB, and WEST PALM BEACH FIREFIGHTERS'	Case No. 3:22-cv-03811-TLT							
15	PENSION FUND, Individually and On Behalf of All Others Similarly Situated,	DECLARATION OF STACEY M. KAPLAN IN SUPPORT OF PLAINTIFFS' MOTION							
16	Plaintiffs,	TO CERTIFY CLASS, APPOINT CLASS REPRESENTATIVES, AND APPOINT							
17	v.	CLASS COUNSEL							
18	WELLS FARGO & COMPANY, CHARLES W. SCHARF, KLEBER R. SANTOS, and CARLY	Date: April 29, 2025							
19	SANCHEZ,	Time: 2:00 p.m. Location: Ctrm. 9, 19 th Floor							
20	Defendants.	Judge: Hon. Trina L. Thompson							
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I, Stacey M. Kaplan, declare as follows:

- 1. I am a member of the Bar of the State of California and a partner at the law firm of Kessler Topaz Meltzer & Check, LLP, counsel of record for Court-appointed Lead Plaintiff SEB Investment Management AB ("Lead Plaintiff" or "SEB") and additional Plaintiff West Palm Beach Firefighters' Pension Fund ("WPB Fire," and together with SEB, "Plaintiffs") in the above-captioned action. I submit this declaration in support of Plaintiffs' Motion to Certify Class, Appoint Class Representatives, and Appoint Class Counsel.
- 2. Attached hereto as **Exhibit 1** is the Expert Report of Joseph R. Mason, Ph.D., dated January 17, 2025.
- 3. Attached hereto as **Exhibit 2** is a true and correct copy of a document bearing Bates number WF_SEB_00070794.
- 4. Attached hereto as **Exhibit 3** is a true and correct copy of a document bearing Bates number WF_SEB_00115755.
- 5. Attached hereto as **Exhibit 4** is a true and correct copy of a document bearing Bates number WF_SEB_00121257.
- 6. Attached hereto as **Exhibit 5** is a true and correct copy of a document bearing Bates number WF_SEB_00072147.
- 7. Attached hereto as **Exhibit 6** is a true and correct copy of a document bearing Bates number WF_SEB_00077800.
- 8. Attached hereto as **Exhibit 7** is a true and correct copy of a document bearing Bates number WF SEB 00077612.
- 9. Attached hereto as **Exhibit 8** is a true and correct copy of a document bearing Bates number WF_SEB_00077804.
- 10. Attached hereto as **Exhibit 9** is a true and correct copy of a document bearing Bates number WF SEB 00148888.
- 11. Attached hereto as **Exhibit 10** is a true and correct copy of a document bearing Bates number WF_SEB_00182260.

12.	Attached he	ereto as	Exhibit 1	1 is	a true	and	correct	сору	of a	document	bearing	Bates
number WF_	SEB_0015032	24.										

- 13. Attached hereto as **Exhibit 12** is a true and correct copy of a document bearing Bates number WF SEB 00242569.
- 14. Attached hereto as **Exhibit 13** is a true and correct copy of a document bearing Bates number WF_SEB_00242570.
- 15. Attached hereto as **Exhibit 14** is a true and correct copy of a document bearing Bates number WF_SEB_00242571.
- 16. Attached hereto as **Exhibit 15** is a true and correct copy of a document bearing Bates number WF SEB 00243303.
- 17. Attached hereto as **Exhibit 16** is a true and correct copy of a document bearing Bates number WF_SEB_00150580.
- 18. Attached hereto as **Exhibit 17** is a true and correct copy of a document bearing Bates number WF SEB 00116156.
- 19. Attached hereto as **Exhibit 18** is a true and correct copy of a document bearing Bates number WF_SEB_00021026.
- 20. Attached hereto as **Exhibit 19** is a true and correct copy of a document bearing Bates number WF SEB 00146906.
- 21. Attached hereto as **Exhibit 20** is a true and correct copy of a document bearing Bates number WF_SEB_00236950.
- 22. Attached hereto as **Exhibit 21** is the Declaration of Caroline Rifall on Behalf of SEB Investment Management AB in Support of Plaintiffs' Motion to Certify Class, Appoint Class Representatives, and Appoint Class Counsel, dated January 17, 2025.
- 23. Attached hereto as **Exhibit 22** is the Declaration of David Merrell on Behalf of West Palm Beach Firefighters' Pension Fund in Support of Plaintiffs' Motion to Certify Class, Appoint Class Representatives, and Appoint Class Counsel, dated January 16, 2025.
 - 24. Attached hereto as **Exhibit 23** is the Firm Resume of Kessler Topaz Meltzer & Check, LLP. I declare, under penalty of perjury, that the foregoing is true and correct to the best of my

1	knowledge.					
2	Executed: January 17, 2025, at San Francisco, California.					
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4	/s/ Stacey M. Kaplan Stacey M. Kaplan					
5	KESSLER TOPAZ					
6	MELTZER & CHECK, LLP					
7	Counsel for SEB Investment Management AB and					
8	Lead Counsel for the Putative Class					
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	3 Case No. 3:22-cv-03811-TLT					
	DECLARATION OF KAPLAN IN SUPPORT OF PLAINTIFFS' MOTION TO CERTIFY CLASS, APPOINT CLASS REPRESENTATIVES, AND APPOINT CLASS COUNSEL					